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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

HELENE SAREN-LAWRENCE,

Defendant.

Adv. Pro. No. 10-04898 (SMB)

DECLARATION IN SUPPORT OF MOTION FOR A PROTECTIVE ORDER

I, JAMES LAWRENCE, declare pursuant to 28 U.S.C. § 1746, that the following is true
based upon my personal knowledge and documents I possess:

1. I am the husband of Helene Saren-Lawrence.
2. The Trustee has served a subpoena on Valley National Bank seeking production

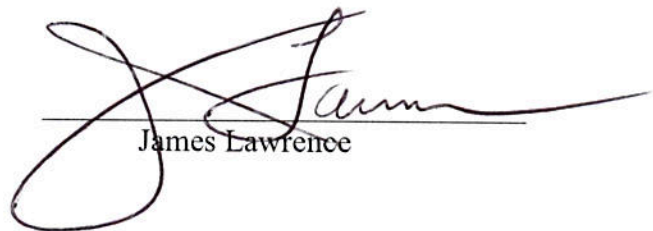
of all bank records concerning Helene's accounts. Since we have had joint accounts for many years, the subpoena demands production of my personal bank records to which the Trustee is not entitled. Obviously, my personal bank records contain personal information which is confidential to me.

3. Moreover, Helene has not worked since December 2006. Thus, all of the money deposited into our bank accounts at Valley National Bank represent my income, with the exception of any deposits from Helene's Madoff account and the tax refund she received as a result of her Madoff losses. Valley National Bank has already produced to the Trustee redacted records showing all transfers to and from Madoff from our joint accounts. Moreover, Helene has not disputed the Trustee's records of deposits and withdrawals for the period from January 1, 2001 on, to the extent that they are not inconsistent with the records subpoenaed by the Trustee from our accountant, Friedman LLP.

4. I do not believe the Trustee can have a legitimate interest in any other records and I respectfully request that the Court quash the Trustee's subpoena.

5. The statements made herein are true to the best of my knowledge and belief

February 22, 2016



James Lawrence